

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENIFER ESHOM,

Plaintiff,

v.

KING COUNTY, a Washington municipal
corporation,

Defendant.

No. 2:23-cv-00028-JNW

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO CONTINUE
CERTAIN CASE DEADLINES

NOTE ON MOTION CALENDAR:
NOVEMBER 27, 2024

JOSEPH ESHOM,

Plaintiff,

v.

KING COUNTY, a Washington municipal
corporation,

Defendant.

No. 2:24-cv-00007-JNW

STIPULATED MOTION AND ~~PROPOSED~~
ORDER TO CONTINUE CERTAIN CASE
DEADLINES – 1

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Plaintiffs Jenifer and Joseph Eshom and Defendant King County jointly request that this Court vacate and continue certain case deadlines, including Jenifer Eshom's trial date, thereby establishing the case schedule set forth in the table below.¹

Event	Current Deadline	Requested Deadline
Joseph Eshom Jury Trial (8-10 days)	September 8, 2025	September 8, 2025
Jenifer Eshom Jury Trial (8-10 days)	June 9, 2025	November 3, 2025
Deadline for Filing Amended Pleadings	November 11, 2024	November 11, 2024
Disclosure of Non-Financial Expert Testimony	November 11, 2024	November 11, 2024
Disclosure of Non-Financial Rebuttal Expert Testimony	December 11, 2024	December 11, 2024
Disclosure of Financial Expert Testimony	December 9, 2024	December 9, 2024
Disclosure of Rebuttal Expert Financial Testimony	January 9, 2025	January 9, 2025
Filing of Discovery Motions	December 11, 2024	February 7, 2025
Discovery Complete	January 10, 2025	March 7, 2025
Filing of Dispositive Motions	February 9, 2025	April 7, 2025
Filing of Motions Challenging Expert Witnesses Under <i>Daubert</i>	February 9, 2025	April 7, 2025
Joseph Eshom Settlement Conference	July 10, 2025	July 10, 2025
Joseph Eshom Motions In Limine	July 30, 2025	July 30, 2025
Joseph Eshom Deposition Designations Submitted to the Court	August 18, 2025	August 18, 2025
Joseph Eshom Agreed Pretrial Order Submitted to the Court	August 18, 2025	August 18, 2025
Joseph Eshom Trial Briefs, Proposed Voir Dire Questions, and Proposed Jury Instructions Submitted to the Court	August 25, 2025	August 25, 2025

¹ The cumulative effect of these requested continuances is to provide the parties additional time for discovery in each of these partially consolidated cases, affirm the trial date and trial related deadlines assigned to the case by Joseph Eshom, and continue the trial date and trial related deadlines assigned to the case by Jenifer Eshom.

Joseph Eshom Pretrial Conference	September 1, 2025	September 1, 2025
Jenifer Eshom Settlement Conference	April 10, 2025	September 4, 2025
Jenifer Eshom Motions In Limine	April 30, 2025	September 24, 2025
Jenifer Eshom Deposition Designations Submitted to the Court	May 19, 2025	October 13, 2025
Jenifer Eshom Agreed Pretrial Order Submitted to the Court	May 19, 2025	October 13, 2025
Jenifer Eshom Trial Briefs, Proposed Voir Dire Questions, and Proposed Jury Instructions Submitted to the Court	May 26, 2025	October 20, 2025
Jenifer Eshom Pretrial Conference	June 2, 2025	October 27, 2025

Good cause supports this joint request because:

1. The parties are working amongst themselves to resolve discovery disputes concerning: (A) financial disclosures, (B) document collection, (C) written discovery, (D) complex e-discovery issues, and (E) deposition scheduling.

2. After several discovery conferences, the parties reached discovery agreements they believe will eliminate the need for motions or cross-motions to compel. The parties nevertheless do not believe all document productions, written discovery, and depositions can reasonably be completed before the current discovery cutoff of January 10, 2025.

3. Providing the parties their requested continuance will therefore conserve judicial resources as well as help facilitate just, speedy, and inexpensive determinations in this action. Fed. R. Civ. P. 1.

1 Stipulated to this 27th day of November 2024.

2 PACIFICA LAW GROUP LLP

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7 s/ Jacob A. Zuniga

8 Jacob A. Zuniga, WSBA #48458

9 *Attorneys for Defendant King County*

~~PROPOSED~~ ORDER

The Court grants the parties' stipulated motion. The following deadlines are established:

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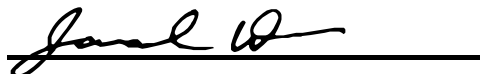
STIPULATED MOTION AND ~~PROPOSED~~
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The Court adds that, absent extraordinary circumstances, this will be the final trial continuance in these partially consolidated cases.

Dated this 18th day of December, 2024.



Honorable Jamal N. Whitehead
United States District Court Judge